REMARKS/ARGUMENTS

The Office Action mailed December 23, 2004 has been reviewed and carefully considered. Claims 1-19 and 68-75 are canceled. Claims 20, 23, 57, and 67 have been amended and claims 76-85 are added. Claims 20-67 and 76-85 are pending in this application, with claims 20, 57, 78, and 83 being the only independent claims. Reconsideration of the above-identified application, as herein amended and in view of the following remarks, is respectfully requested.

In the Office Action mailed December 23, 2004, the claim 67 is objected to because the limitation "blade plate" does not have proper antecedent basis in the specification. Claim 67 is amended to recite --cleaning plate--. Steel plate 12 is described in the original specification on page 8, lines 10-16, as being used to clean the nozzle plate 6 or the screen plate 4. Therefore, the use of the term "cleaning" as a label to differentiate the claimed cleaning plate from the other plates such as the nozzle plate has antecedent basis in the specification. As stated in the MPEP §2173.05(e):

> "The mere fact that a term or phrase used in the claim has no antecedent basis in the specification disclosure does not mean, necessarily, that the term or phrase is indefinite. There is no requirement that the words in the claim must match those used in the specification disclosure. Applicants are given a great deal of latitude in how they choose to define their invention so long as the terms and phrases used define the invention with a reasonable degree of clarity and precision".

In view of the above amendments and remarks, the objection to claim 67 should now be withdrawn.

Claims 23, 28, 33, 39, 45, and 51 stand rejected under 35 U.S.C. §112, second paragraph, as being indefinite because "the surface" in line 5 of claim 23 lacks antecedent basis. As suggested by the Examiner, that recitation should refer to the surface that contacts the web in the roll nip and claim 23 has been amended in accordance with the Examiner's suggestion. In view

of the above amendments and remarks, the rejection of claims 23, 28, 33, 39, 45, and 51 under 35 U.S.C. §112, second paragraph, should now be withdrawn.

Claims 25-29, 35, 41, 47, 53, 59-60, 63, and 66-67 were found to contain allowable subject matter and would be allowable if rewritten in independent form. In view of the allowable subject matter, new independent claims 78 and 83 are presented. New claim 78 incorporates the limitations of claim 25 and base claim 20 and new claim 83 incorporates the limitations of claim 59 and base claim 57. New dependent claims 79-82 correspond to claims 35, 41, 47, and 53 and new dependent claims 84 and 85 correspond to claims 63 and 66. In view of the allowable subject matter, claims 78-85 should be allowed.

Claims 20 and 24 stand rejected under 35 U.S.C. §102(b) as anticipated by U.S. Patent No. 5,614,264 (Himes).

Claims 20-22, 24, 48-50, 52, and 57-58 stand rejected under 35 U.S.C. §103 as unpatentable over U.S. Patent No. 5,789,022 (Kustermann) in view of Himes.

Claims 23, 30-34, 36-40, 42-46, 51, 54-56, 61-62, and 64-65 stand rejected under 35 U.S.C. §13 as unpatentable over Kustermann and Himes in view of various other references.

Independent claims 20 and 57 are each amended to recite that the nozzle plate is formed so that "each of the jets remains separated from the other ones of the jets in the space between the at least one nozzle plate and the moving surface". Support for this limitation is found in the original application on page 6, lines 36-38.

Himes discloses a fluid delivery apparatus and method in which fluid is dispensed via nozzle plates. According to Himes, fluid dispensers 17, 18 are arranged on opposing sides of a path of travel 22 for articles 11 being conveyed through the system (see col. 3, lines 33-46, of Himes). In each dispenser, fluid is delivered to a nozzle plate 40 having nozzle plate openings

41, 42, 43 (col. 4, lines 13-19). Each nozzle communicates with a transverse groove 67 (col. 5, lines 56-59; Figs. 4 and 5). The groove connects a plurality of small columns of liquid into a generally flat transversely disposed planar spray of liquid and facilitates a fan spray of liquid from the individual nozzles into a screen (col. 6, lines 6-10). Since Himes purposely facilitates a fan spray for connecting a plurality of sprays into a planar spray of liquid, Himes fails to disclose teach or suggest "each of the jets remains separated from the other ones of the jets in the space between the at least one nozzle plate and the moving surface".

Kustermann discloses a method and device for indirect coating of at least one side of a material web utilizing a free jet. Kustermann discloses a free-jet nozzle device 5 for emitting a free jet of coating material. Kustermann does not disclose a nozzle plate. Instead, the nozzle device 5 is preferably curved (see col. 6, lines 9-10 of Kustermann). The Examiner relies on the combination of Kusterman with the nozzle plate of Himes. However, Himes discloses that the jets purposefully touch one another to form a screen. Moreover, Kustermann does not disclose a prohibition of a free jet touching another free jet. Accordingly, the combined teachings of Kustermann and Himes fail to disclose teach or suggest "each of the jets remains separated from the other ones of the jets in the space between the at least one nozzle plate and the moving surface", as expressly recited in amended independent claims 20 and 57.

In view of the above amendments and remarks, independent claims 20 and 57 are allowable over the prior art of record. Dependent claims 21-56, 58-67, and 76-77, each being dependent on one of independent claims 20 and 57, are deemed allowable for at least the same reasons as independent claims 20 and 57.

Dependent claims 76 and 77 further recite that the nozzle plate has a thickness of 0.1 - 0.5 mm. Support for this limitation is found in the specification at page 6, lines 5-6. As stated

above, Kustermann fails to disclose a nozzle plate. Himes fails to disclose a specific dimension for the thickness of the nozzle plate. As further stated on page 6, lines 10-12, the thickness is a function of the diameter of the nozzle openings. Kustermann and Himes fail to teach or suggest that the thickness of the nozzle plate is even a concern. Accordingly, Kustermann and Himes fail to teach or suggest the limitations of dependent claims 76 and 77.

The application is now deemed to be in condition for allowance and notice to that effect is solicited.

A check including the amount $700 is enclosed in payment for the addition of one new independent claim in excess of three, and the addition of 10 new claims in excess of 20.

It is believed that no fees or charges are required at this time in connection with the present application; however, if any fees or charges are required at this time, they may be charged to our Patent and Trademark Office Deposit Account No. 03-2412.

Respectfully submitted,

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